

EXHIBIT 1

Steven Isser

From: Steven Isser
Sent: Thursday, July 11, 2024 10:49 AM
To: Tyrone Anthony Blackburn, Esq.
Subject: RE: Depositions

That is not what happened and you know this. Ms. Hough was clearly confused by my previous question and I referred to movies to put my question in context so she could understand it, but you began yelling and objecting before I could finish my question. Further, even if I did ask an irrelevant question about movies, which was not the case, this would not be a valid basis to unilaterally terminate a deposition because you did not like one question (or. More likely because you did not like your client's testimony concerning this line of questioning). If you want to bring your conduct before the Court, that is your right, and you can file any letter you like. I believe, however, that it is likely that the Court will allow me to finish Ms. Hough's deposition and the letter will only cause delay.

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From: Tyrone Anthony Blackburn, Esq. <tblackburn@tablackburnlaw.com>
Sent: Thursday, July 11, 2024 10:31 AM
To: Steven Isser <sisser@isserlaw.com>
Subject: Re: Depositions

I will file a letter to the court to compel your clients appearance and you can explain to the judge why you thought it was necessary to question Ms. Hough about movies.

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC
TABlackburnlaw.com

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On Jul 11, 2024, at 10:16 AM, Steven Isser <sisser@isserlaw.com> wrote:

Tyrone,

Your outburst at your client's deposition was uncalled for and unprofessional. More importantly, however, your unilateral termination of the deposition was improper and prejudiced my client. I am entitled to finish Ms. Hough's deposition and my client will not appear for a deposition until Ms. Hough's deposition is concluded. Please provide me with dates that you and Ms. Hough are available to finish her deposition.

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